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APR 18 2013

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Kristi Harrington, Circuit Court Judge
Case NO. 2011-CP-10-1528

Cynthia McNaughton Respondent,

v.

Charleston Charter School for Math and Science Appellant.

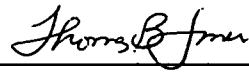
RESPONDENT'S MOTION TO ACCEPT RECORD AS FILED

COMES NOW Respondent, pursuant to Rules 210 and 267, SCRAP, and requests that this Court accept as- filed the Record on Appeal as follows:

1. Respondent timely filed the Record on Appeal consisting of 312 pages in only one volume;
2. Although Respondent correctly produced the Record on Appeal with pages typewritten on two sides pursuant to Rule 267(c), Respondent included all such pages in only one volume thus exceeding by 62 pages the 250 page limit; and
3. Because the one volume Record on Appeal exceeds the limit by only 62 pages and because such error would not prejudice any party or the Court, Respondent respectfully requests that the Record on Appeal be accepted as filed; in the alternative, should this Court deny Respondent's request, then Respondent respectfully requests that it be given 15 days from the date of receiving this Court's decision within which to separate the additional 62 pages into a separate volume.

Respectfully submitted,

April 15, 2013



Thomas Bailey Smith, Esq.
Attorney for Respondent

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PROOF OF SERVICE

By signing below I hereby acknowledge that I have this 15th day of April, 2013, served via regular first class U.S. mail, properly addressed and proper postage prepaid, Respondent's Motion to Accept Record as Filed upon the following:

Nancy Bloodgood, Esq.
Lucy C. Sanders, Esq.
895 Island Park Drive, Suite 202
Charleston, SC 29492

April 15, 2013



Thomas Bailey Smith, Esq.
Respondent's Attorney

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April 15, 2013

S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: McNaughton v. Charleston Charter School for Math and Science, Inc.
Appellate Case No. 2012-212451

Dear S.C. Court of Appeals:

Enclosed for filing please find Respondent's original Motion to Accept Record As Filed, six copies of the Motion and the \$25.00 filing fee. Because all of the grounds and arguments are contained in a precise statement in the Motion, a separate memorandum is not needed.

Please note that my office learned of your letter dated March 12, 2013, only late last week as a result of communications with opposing counsel. Please use my office's new address and contact information, above, for all future correspondence.

With kindest regards,



Thomas Bailey Smith

tbs:cc

Encs. (original and six copies of the Motion, Motion Fee, Proof of Serv.)

cc: Nancy Bloodgood, Esq. (w/encs.)

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